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June 13, 2023

**VIA ECF**

The Honorable Taryn A. Merkl  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Trooper 1 v. Cuomo, et al.; Case No. 22-cv-00893 (LDH)(TAM)

Dear Judge Merkl:

We represent Plaintiff Trooper 1 (“Plaintiff” or “Trooper 1”) in this matter. Pursuant to the Court’s June 6, 2023 Order, we write to propose the following briefing scheduling concerning motions to quash subpoenas regarding Lindsay Boylan and Charlotte Bennett: Trooper 1, Boylan and Bennett<sup>1</sup> will file their motions on June 30, 2023; Cuomo’s opposition will be due by July 19, 2023; replies will be filed by August 2, 2023.

Secondly, the parties have resolved Trooper 1’s request to compel Cuomo’s deposition and agreed upon August 23, 2023 for his deposition.

Finally, all parties respectfully request an extension of the July 11, 2023 discovery deadline to September 29, 2023. Defendants (NYSP, Cuomo, DeRosa, and Azzopardi), however, jointly request a further extension until at least October 31, 2023 because of disputes and litigation regarding nonparty subpoenas.

We thank the Court for its consideration and time in connection with this matter.

Respectfully submitted,



Valdi Licul

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<sup>1</sup> Counsel for Boylan and Bennett oppose the subpoenas and will join the motions to quash.